

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ
SECURITIES LITIGATION

Case No. 1:19-cv-01339

The Hon. Robert M. Dow, Jr.

**MOTION TO DISMISS
THE CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, *et seq.*, and upon the accompanying memorandum of law and exhibits, Defendants The Kraft Heinz Company, Bernardo Hees, Paulo Basilio, David Knopf, Alexandre Behring, George Zoghbi, and Rafael Oliveira respectfully move the Court to dismiss Plaintiffs' Consolidated Class Action Complaint dated January 6, 2020 in its entirety and with prejudice. Additionally, the Defendants request the opportunity to present oral argument on this motion.

March 6, 2020

Respectfully submitted,

**PAUL, WEISS, RIFKIND, WHARTON &
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/s/ Daniel J. Kramer

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Rafael Oliveira*

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2020, I electronically filed the foregoing Motion to Dismiss the Consolidated Class Action Complaint with the Clerk of the Court through the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Daniel J. Kramer

Daniel J. Kramer